

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                            )  
                            )  
v.                        )       CRIMINAL NO. 05-10113-DPW  
                            )  
                            )  
REYLANDO REYES,          )  
a/k/a REYLANDO RISE,      )  
a/k/a RAYNALDO RISE,      )  
a/k/a RAYLANDO RISE,      )  
a/k/a RAY RISE,          )  
                            )  
Defendant.              )

**ASSENTED-TO MOTION TO EXCLUDE THE TIME FROM  
NOVEMBER 21, 2005 THROUGH DECEMBER 21, 2005,  
AND FOR AN ORDER ON EXCLUDABLE DELAY**

The United States hereby moves move, pursuant to 18 U.S.C. §3161(h)(8)(A) and Section 5(c)(1)(A) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, to exclude the time within which trial must commence under 18 U.S.C. §3161(c)(1), excluding from such computation all time, commencing on November 21, 2005 (date of initial status conference), and concluding on December 21, 2005 (date of interim status conference).

As grounds therefor, the undersigned states that Counsel for Defendant, Stylianus Sinnis, Esq., has requested an additional thirty (30) days to determine whether to seek further discovery. The Court has granted counsel's request and has scheduled an Interim Status Conference for December 21, 2005 at 10:00 a.m.

Counsel for Defendant, Stylianus Sinnis, Esq., has given his assent to this motion.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice are served by granting the requested exclusion, and that said exclusion outweighs the best interest of the public and the defendants in a speedy trial, and, accordingly, exclude all time, **commencing on November 21, 2005, and concluding on December 21, 2005**, in computing the time within which trial must commence under 18 U.S.C. §3161, and request that the Court enter an Order of Excludable Delay.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/Antoinette E.M. Leoney  
ANTOINETTE E.M. LEONEY  
Assistant U.S. Attorney  
(617) 748-3103

Date: November 21, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts  
November 21, 2005

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, do hereby certify that I have this day served by electronic court filing a copy of the foregoing to Stylianus Sinnis, Esq., Federal Defender Office, 408 Atlantic Avenue, 3<sup>rd</sup> Floor, Boston, MA 02110.

/s/Antoinette E.M. Leoney  
ANTOINETTE E.M. LEONEY